



August 14, 2020

**VIA ECF**

The Honorable William H. Orrick  
U.S. District Court for the Northern District of California

Re: Letter in Support of Appointment of Leadership Team for Direct Purchasers  
*Reece v. Altria Group, Inc. et al.*, No: 20-cv-02345-WHO

Dear Judge Orrick:

We represent Plaintiffs in *McGee v. Juul Labs Inc., et al.*, Case No. 3:20-cv-04413-WHO, *Carlson v. Altria, Inc. et al.*, Case No. 3:20-cv-03430-WHO, and *Blomquist v. Altria, Inc. et al.*, Case No. 3:20-cv-02512-WHO, each of which has been related to the above-captioned matter and transferred for coordination with the MDL proceeding, *In Re: JUUL Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation*, No. 3:19-md-02913-WHO (N.D. Cal.). We jointly submit this letter pursuant to the Court's Order (ECF 86), in support of appointment of a leadership team for the direct purchaser plaintiffs. We collectively agree that the team that meets the requirements of Fed. R. Civ. P. 23(g), reflects diversity, and is most qualified and prepared to lead this litigation is Swathi Bojedla of Hausfeld LLP as lead counsel, and Jill M. Manning of Steyer Lowenthal Boodrookas Alvarez & Smith LLP and Todd Seaver of Berman Tobacco as committee members. We are confident that this team will work vigorously and efficiently to achieve a just resolution of the litigation on behalf of the direct purchaser plaintiffs.

Respectfully submitted,

/s/ William G. Caldes  
William G. Caldes  
Icee Etheridge  
Spector, Roseman &  
Kodroff, P.C.

/s/ David P. McLafferty  
David P. McLafferty  
McLafferty Law Firm, P.C  
.

/s/ Michael J. Boni  
Michael J. Boni  
Boni, Zack & Snyder LLC

/s/ Lee Albert  
Lee Albert  
Glancy Prongay &  
Murray LLP

/s/ Marco Cercone  
Arthur Bailey  
Marco Cercone  
Rupp Baase Pfalzgraf  
Cunningham LLC

/s/ Christian Levis  
Christian Levis  
Amanda Fiorilla  
Anthony Michael Christina  
Lowey Dannenberg, P.C.

cc: All counsel of record  
(via ECF)

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**ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, William G. Caldes hereby attest that concurrence in the filing of this Joint Letter has been obtained from all signatories. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14<sup>th</sup> day of August 2020, at Philadelphia, PA.

By: /s/ William G. Caldes  
WILLIAM G. CALDES